

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION

CYNTHIA K. HAYNES (a/k/a Cynthia K.	)	
Randolph), individually and under the Missouri	)	
Wrongful Death Statute	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No: 1:21-CV-00160-ACL
	)	
JENNIFER WILLIAMS, individually, et al.	)	
	)	
Defendants.	)	

**WILLIAMS DEFENDANTS' MOTION FOR JUDGMENT ON THE PLEADINGS**  
**AS TO COUNT I OF PLAINTIFF'S AMENDED COMPLAINT**  
**MADE PURSUANT TO FED. R. CIV. P. 12(c)**

Come now Defendants Jennifer Williams, individually, and Jennifer Williams d/b/a Williams Law (collectively hereinafter, "Williams"), by and through undersigned counsel, who respectfully move for an order entering judgment on the pleadings and dismissing Count I of Plaintiff's Amended Complaint with prejudice pursuant to Federal Rule of Civil Procedure 12(c).

In support thereof, Williams contemporaneously files herewith, and incorporates herein, their Memorandum of Law in Support of its Motion for Judgment on the Pleadings.

WHEREFORE, Defendants Jennifer Williams, individually, and Jennifer Williams d/b/a Williams Law, respectfully request that this Court dismiss Count I of Plaintiff's Amended Complaint with prejudice, award Williams costs and fees, and for any such further relief as the Court deems just and proper under the circumstances.

Respectfully submitted,

ROBERTS PERRYMAN, P.C.

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**Attorneys for Defendants Jennifer Williams and**  
**Jennifer Williams d/b/a Williams Law**

### **CERTIFICATE OF SERVICE**

I hereby certify that on February 27, 2023, the foregoing was electronically filed with the Clerk of the Court using CM/ECF electronic filing system which will send notification of such filing to the following and email to all counsel of record.

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